

Former CES Facility
4904 Griggs Road
Houston TX, 77021

Forward Activities AST Containment Areas

The CES facility has 2 AST containment areas that have been used as dumping areas for debris, water, hydrocarbons and other associated materials. For the safe and timely removal of the contents of the ASTs contents to a disposal facility, these debris and impacts must be removed for the safe and timely removal.

Proposed activities:

- Removal of water from the containment areas and stored for future disposal
 - Before activities start both waste streams will have to be evaluated for chemical impacts to determine compatibility with equipment and proper PPE choice
 - South Containment: Analytical has been completed as it contains significant hydrocarbon materials.
 - North Containment: Analytical has not been completed as it contains collected rainfall and there is no plan to acquire such analytical.
 - Physical hazards and chemical exposure during this activity will be minimized by using best practices and proper PPE
 - The trash pump use and other associated JSAs will be reviewed before activities start in the north containment
 - Vac-con and hose management JSAs will be reviewed before activities start in the south containment
 - A review of chemical impacts will be reviewed before activities start
 - Pump and hoses will be placed to minimized physical and chemical impact to workers and equipment
 - All hoses and pump will be flushed and exterior of hoses will be cleaned of all impacts
 - North Containment will use a 2 inch trash pump into FT-5180
 - This water is assumed non-hazardous
 - This water is assumed to have no petrochemicals impacts
 - South Containment will use vac-truck for disposal
 - This water has hydrocarbon/petroleum impacts and must be shipped to a approved facility
- Removal of debris from containment areas
 - Physical hazards are the main concern of working in this area
 - Slips, trips and falls
 - Pinch points
 - Sharps and cuts
 - Chemical hazards
 - Containments are assumed to be nonhazardous
 - Level D PPE will be used with Tychem SL coveralls
 - Abrasion gloves over neoprene inner gloves will be used to protect the worker from unknown chemical exposure

- Coveralls will be used to protect the worker from impacts of grime and dirt and possible chemical exposure in the containment area
- Waterproof/chemical boots will be worn when inside the containment area to minimize exposure to mud or sludge in the containment area
- Debris consists of plastic buckets, wood, and other trash
- Two man teams will be used for the physical removal of the debris inside the containment area
- When material greater than 50 pounds are to be moved mechanical means may be used
- Material will be contained onsite in segregated areas in the truck cleaning bay and/or working bay on poly sheeting for subsequent decon if necessary.

Comment (Lets Discuss):

North Containment: Trash and Debris can be removed from the south containment (collected rainwater) prior to removing the collected rainwater into FT5180. The debris will be placed into the wash bay or working bay depending on degree of contamination. This should take no longer than 2 hours to complete. We will not remove additional rainfall that falls in this containment prior to future actions on tanks unless approved by the OSC.

South Containment: Oil phase will be removed into a Vac Truck as was designated by the proposed disposal facility and the T&D Coordinator (confirm that we ship oil and water to Lonestar). All debris will be transferred into the bucket of the backhoe and transferred to the working bay for decon or truck wash bay for decon. Oily residual on containment walls and floor will be deconned and water put in FT5180.

If I missed anything, let me know.